

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Justine Moore,

Plaintiff

v.

Merchants & Medical Credit
Corporation, Inc.,

Defendant

Docket No. 3:21-cv-01724-MEM

(Judge Malachy E. Mannion)

ELECTRONICALLY FILED

PLAINTIFF’S MOTION TO EXTEND BRIEFING SCHEDULE

1. Plaintiff, Justine Moore, moves this Court for an order extending the briefing schedule regarding the cross-motions for summary judgment by fourteen days.

2. Presently, each party must file a brief in opposition by April 3, 2023.

3. Last week, the undersigned was out of the state for a conference, and just returned yesterday evening.

4. Earlier today, the undersigned tested positive for Covid-19, and is symptomatic.

5. Thus, additional time is needed to allow for the preparation of Plaintiff’s brief in opposition.

6. The undersigned has attempted to contact counsel for Defendant to obtain concurrence. However, the undersigned received an out-of-office email, which indicated that Defendant's counsel would not be back in the office until April 3, 2023.

7. Thus, this motion is currently being filed without the consent of the Defendant.

8. However, Plaintiff anticipates that Defendant will concur with this request, and in such a situation Plaintiff will file a certificate of concurrence.

9. This motion is not being filed to cause unnecessary delay, and is not being filed for any improper purpose. Furthermore, this motion was filed as soon as practicable given the circumstances.

WHEREFORE, Plaintiff respectfully requests that the deadline for each party to file a brief in opposition be extended until April 17, 2023.

s/ Brett M. Freeman
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